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14 **UNITED STATES BANKRUPTCY COURT**

15 **NORTHERN DISTRICT OF CALIFORNIA - DIVISION 5**

16

17 In re:	Case No. 18-50774-MEH
18 ROSS ELITE REALTY GROUP, LLC,	Chapter 11
19	Date: July 27, 2018
20	Time: 2:00 p.m.
21	Courtroom: 3020
22	Debtor.
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18 **LIMITED OBJECTION TO MOTION TO SELL REDWOOD CITY REAL**  
**PROPERTY FREE AND CLEAR OF LIENS**

19 Comes now Philip Theodore, a member the Debtor Ross Elite Realty Group, LLC  
20 (“Debtor”) and a party in interest in this bankruptcy case and submits the following limited  
21 objections to the proposed sale of the property of the Bankruptcy Estate commonly known as 1402  
22 Arguello Court, Redwood City, California (the “Redwood City Property”).  
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24 Mr. Theodore generally supports the proposed sale of the Redwood City Property. His  
25 objection is limited to requesting language in any order approving the sale of the Redwood City  
26 Property such that the order shall limit the distribution of funds from escrow to the payment of (a)  
27 approved liens or on account of disputed liens such as the County Tax Collector and recorded  
28

1 deeds of trust, (b) costs of sale, and (c) other amounts consistent with the contract for sale between  
2 the Debtor and the buyer that was filed with the Court. In addition, the order should provide that  
3 any excess proceeds should be held in trust by Debtor's counsel, Charles Greene, pending further  
4 order of the Court as to their proper disposition and not placed in the debtor-in-possession bank  
5 account due to the failure of the Debtor and its Responsible Individual Zachary Ross to comply  
6 with prior orders of this Court, including but not limited to the Court's most recent order issued on  
7 July 10, 2018 (docket #56) which required production of documents to Mr. Theodore's counsel on  
8 July 13, 2018, which did not occur.

Dated: July 13, 2018 BINDER & MALTER, LLP

By: /s/ Julie H. Rome-Banks  
Julie H. Rome-Banks  
Attorneys for Philip Theodore